

RESPONSE UNDER 37 C.F.R. § 1.116
U.S. Appln. No.: 09/977,194
Attorney Docket No.: Q66658

REMARKS

This amendment, submitted in response to the Office Action dated February 20, 2004, is believed to be fully responsive to each point of objection raised therein. Accordingly, favorable reconsideration is respectfully requested.

Claims 1-20 are all the claims pending in the application.

I. Formal Matters

Applicant thanks the Examiner for acknowledging the claim to foreign priority under 35 U.S.C. § 119(a)-(d) and for confirming that the certified copy of the priority document was received.

Applicant also thanks the Examiner for initialing the references listed on form PTO-1449 submitted with the Information Disclosure Statements filed on October 16, 2001 and on July 17, 2003.

II. Preliminary Matters

In the Office Action dated January 8, 2004 Applicant amended claims 1, 5, and 17 to correct minor grammatical errors. Applicant submits that such amendments were not made in response to any prior art rejection or other rejection. Such amendments did not narrow the scope of the claims and, therefore, did not subject the claims to prosecution history estoppel. Because Applicant's amendments were minor, they did not necessitate any new grounds of rejection presented in the Office Action. Applicant notes that the Examiner cites the Dewar (U.S. Patent

RESPONSE UNDER 37 C.F.R. § 1.116
U.S. Appln. No.: 09/977,194
Attorney Docket No.: Q66658

No. 6,217,234, B1, hereafter "Dewar") reference which is a newly cited reference that was not included on any Information Disclosure Statement filed by Applicant.

A Non Final Office Action was issued September 8, 2003, in the above-identified application, in which claims 1-20 were rejected. Applicant filed an Amendment on January 8, 2004, amending claims 1, 5, and 17 to correct minor grammatical errors, which did not necessitate additional searches for the Examiner. In fact, on page 12 of the Amendment, Applicant explained that "Applicant has amended claims 1, 5, and 17 to correct minor grammatical errors." Therefore, Applicants respectfully requests that the Examiner withdraw the finality of the Office Action.

III. Claims

Claims 1-20 are all the claims pending in the application. Claims 1-14 and 17-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Okuda (U.S. Patent No. 6,380,689 B1, hereafter "Okuda") in view of Nakano (U.S. Patent No. 6,043,818, hereafter "Nakano") and Dewar (U.S. Patent No. 6,217,234, B1, hereafter "Dewar"). Claims 15 and 16 are rejected under 35 U.S.C. §103(a) as being unpatentable over Okuda in view of Nakano in further view of Ge et al (U.S. Patent No. 5,347,292, hereafter "Ge"). Applicant respectfully submits the following arguments in traversal of the prior art rejections.

The Examiner contends that the independent claims 1, 5, 17, and 19 and the dependent claims 2-4, 6-14, 18, and 20 are suggested by the combination of Okuda in view of Nakano and the newly cited reference of Dewar. The Examiner correctly concedes that Okuda fails to read memory from the memory unit in a different order for each single predetermined frame or each

RESPONSE UNDER 37 C.F.R. § 1.116
U.S. Appln. No.: 09/977,194
Attorney Docket No.: Q66658

plural predetermined frames. Also, the Examiner correctly concedes that Okuda is deficient in teaching a plurality of unit display data written to the picture displaying unit in an order when the plurality of the unit display data are read from the memory unit such that the display content in the picture displaying unit is different for each predetermined frame or frames. Consequently, the Examiner cites Nakano to make up for the above deficiencies. However, the Examiner's rejection is not supported for at least the following reasons.

As shown in Fig. 15, bit-map data of eighteen situations 1 to 18 are prepared in advance as bit-map data for icon (*see* col. 14, ln. 5-7, Nakano). The bit map data are read and displayed on display memory in the order from No. 1 to No. 18, so that icon is easily displayed as if it is rotating clockwise (*see* col. 14, ln. 7-10, Nakano). When the shadows are displayed, the image data of both icon and its shadow are prepared in advance as images 1 to 18 and they are read sequentially and displayed on display memory (*see* col. 14, ln. 10-13, Nakano). Nakano teaches sequentially reading plural images from the memory thereby displaying the plural images on the display (*see* col. 17, ln. 32-33, Nakano). It is clear that Nakano teaches memory cells read from the memory unit in a specific order from No. 1 to No. 18. By contrast, the claimed invention teaches a plurality of unit display data that is read in a different order from the memory unit for each single predetermined frame or frames.

Therefore, for at least the reasons set forth above, Applicant submits that the Examiner has failed to establish a prima facie case of obviousness with respect to the present invention. Specifically, Applicant notes that one of ordinary skill in the art would not have found it obvious

RESPONSE UNDER 37 C.F.R. § 1.116
U.S. Appln. No.: 09/977,194
Attorney Docket No.: Q66658

to combine Okuda with Nakano. Even if the above combination was made, the result would not teach each and every feature of the claimed invention.

In view of the foregoing, Applicant respectfully requests the Examiner's reconsideration and withdrawal of the above 35 U.S.C. § 103(a) rejection of independent claims 1, 5, 17, and 19. As claims 2-4, 6-14, 18, and 20 further depend on these above claims, Applicant also respectfully submits that these claims are also allowable at least by reason of their dependence.

The Examiner concedes that Okuda fails to teach a memory unit storing a single display data indicative of a display content of said picture displaying unit and memory read from the memory unit in a different order for each single predetermined frame or each plural predetermined frames. The Examiner cites Dewar to make up for the above deficiencies.

However, Dewar is also deficient with respect to reading from the memory unit in a different order. Dewar specifically describes reading, from the first bank of DRAM, the data words associated with one of the cells in the grid pattern identified as contained data words associated with the unaligned cell, then reading from the second bank of DRAM, the data words associated with another of the cells in the grid pattern identified as containing data words associated with the unaligned cell, and doing the above two steps until all the data words associated with the unaligned cell have been read (*see*, col. 11, ln. 31-41, Dewar). Even in Dewar, the art describes a specific order for reading from each of the respective cells. This is contrary to the claimed invention which specifically describes reading from the memory cells in a different order for each predetermined frame.

RESPONSE UNDER 37 C.F.R. § 1.116
U.S. Appln. No.: 09/977,194
Attorney Docket No.: Q66658

In Dewar, the framestores are divided in two so that for the second frame, the meanings of the half field stores change (*see*, col. 71, ln. 13-14, Dewar). But each half field store is itself written and read only one way (*see*, col. 71, 61-62, Dewar). The meanings may change but the way the half field stores are read stays the same. Dewar does not read the frame stores differently or change the display content for each frame. By contrast, in the claimed invention, all of a plurality of the unit display data stored in the plurality of memory cells are read from the memory unit in a different order for each single predetermined frame. The plurality of the unit display data are written to the displaying unit in an order when the plurality of the unit display data are read from the memory unit so that the display content is different for each frame.

Even if one were to attempt to combine Okuda and Dewar, the combination would not result in the claimed invention. Therefore, Applicant respectfully requests the Examiner's reconsideration and withdrawal of the above 35 U.S.C. § 103(a) rejection of independent claims 1, 5, 17, and 19. As claims 2-4, 6-14, 18, and 20 further depend on these above claims, Applicant also respectfully submits that these claims are also allowable at least by reason of their dependence.

Claim 15 depends from independent claim 1 while claim 16 depends from independent claim 5. Okuda and Nakano are deficient with respect to claims 1 and 5 for at least the reasons stated above. Therefore, the Examiner must rely on Ge to compensate for the foregoing deficiencies. Ge is directed to a shield plate structure for applying an electronic field (*see* col.2, ln.60-65, Ge). Ge teaches an image formed from a memory unit and thus displayed in similar ways to the initial image (*see* col.3, ln.35-40, Ge). Ge clearly fails to disclose the art of reading

RESPONSE UNDER 37 C.F.R. § 1.116
U.S. Appln. No.: 09/977,194
Attorney Docket No.: Q66658

memory from the memory unit in different orders so that the display content can ultimately be displayed differently.

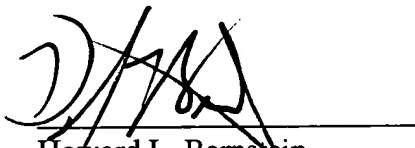
Further, as claims 15 and 16 depend on claims 1 and 5, respectively, and because Ge fails to cure the deficient features of Okuda and Nakano, Applicant submits that these claims are also allowable, at least by reason of their dependence. The Examiner is therefore respectfully requested to withdraw the § 103(a) rejection.

IV. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,


Howard L. Bernstein
Registration No. 25,665

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

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